

EXHIBIT 30

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12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

15 IN RE CATHODE RAY TUBE (CRT)
16 ANTITRUST LITIGATION

17 This Document Relates To:

18 *Target Corp., et al. v. Technicolor SA, et*
19 *al., Case No. 13-cv-05686*

Master File No. 3:07-cv-05944-SC

MDL No. 1917

Individual Case No. 13-cv-05686

**PLAINTIFF TARGET CORP.'S
RESPONSES AND OBJECTIONS TO
DEFENDANTS THOMSON SA AND
THOMSON CONSUMER ELECTRONICS,
INC.'S FIRST SET OF
INTERROGATORIES**

23 PROPOUNDING PARTY: Defendants Thomson SA and Thomson Consumer Electronics, Inc.

24 RESPONDING PARTY: Plaintiff Target Corp.

25 SET NO.: ONE

26 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Target
27 Corp. ("Target") hereby responds to the First Set of Interrogatories to Plaintiff Target
28 ("Interrogatories") served by counsel for Defendants Thomson SA and Thomson Consumer

1 Electronics, Inc. in the above-captioned matter. For the reasons specified below, Target objects
 2 generally and specifically to all specifications in the Interrogatories. Target reserves the right to
 3 supplement the objections and responses set forth below.

4 **GENERAL OBJECTIONS**

5 Target asserts the following General Objections to the Interrogatories, including the
 6 Instructions and the Definitions, which are incorporated by reference in each specific response as
 7 though set forth fully therein:

8 1. Target objects to the Interrogatories to the extent that they are overbroad,
 9 burdensome, and seek information or purport to impose duties or obligations, beyond those set
 10 forth in the Federal Rules of Civil Procedure, the Local Rules of the District Court for the
 11 Northern District of California, or any order of this Court. Target does not agree to undertake any
 12 obligations beyond those required by those Rules.

13 2. Target objects to the Interrogatories to the extent that they duplicate other
 14 interrogatories, in whole or in part, made by other defendants in this matter, in violation of the
 15 integration order included in section XV, subsections D and E of the Court's "Order Re
 16 Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re
 17 Discovery and Case Management Protocol, *In re Cathode Ray Tube Antitrust Litigation*, Case
 18 No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128.

19 3. Target objects to the Interrogatories to the extent that they seek information
 20 protected by the attorney-client privilege and/or attorney work-product doctrine, the joint-
 21 prosecution privilege, or any other privilege or doctrine of confidentiality provided by law, or that
 22 otherwise constitutes information prepared for or in anticipation of litigation. Such information
 23 will not be produced; any production thereof is inadvertent and not a waiver of any applicable
 24 privilege or protection against disclosure.

25 4. Target objects to the Interrogatories to the extent that they seek information not
 26 currently in Target's possession, custody, or control.

27 5. Target objects to the Interrogatories to the extent that they seek information
 28 already in the possession, custody or control of Defendants.

1
2 6. Target objects to the Interrogatories to the extent that they are unreasonable,
3 oppressive, unintelligible, vague, ambiguous, and unduly burdensome and for which the
4 acquisition of information responsive to each would cause Target undue annoyance and expense.

5 7. Target objects to the Interrogatories to the extent that they seek information not
6 related to the claims or defenses of any party in this matter or are not reasonably calculated to
7 lead to the discovery of admissible evidence.

8 8. Target objects to the Interrogatories to the extent that the information sought is
9 unreasonably cumulative or duplicative, or is obtainable from a source other than Target that is
10 more convenient, less burdensome, or less expensive. Target also objects to the Interrogatories to
11 the extent that they seek information that can be more easily obtained by Defendants from public
12 sources.

13 9. Target objects to the Interrogatories to the extent that they contain terms that are
14 vague or ambiguous. Target also objects to Defendants' definitions of words to the extent that
15 they are inconsistent with the plain meaning of those words or impose an expanded definition of
16 the words or phrases. By responding to an Interrogatory containing such a definition, Target does
17 not adopt definitions of terms propounded by Defendants. Instead, Target expressly reserves its
18 right to narrow the scope of the purported definition.

19 10. Target specifically objects to the definitions of "Document(s)," "You," "Your,"
20 "Yourself," "Identify," and "Person" to the extent that such definitions make the Interrogatories
21 overly broad, unduly burdensome, or seek information that is not relevant to the subject matter of
22 this litigation and, therefore, render the Interrogatories not reasonably calculated to lead to the
23 discovery of admissible evidence.

24 11. Target objects to the Interrogatories to the extent that they call for the disclosure of
25 information containing trade secrets or proprietary, sensitive, or other confidential business
26 information.
27
28

12. Target objects to the Interrogatories to the extent that they seek legal conclusions and supporting facts that are not reasonably ascertainable or available at this stage of the litigation.

13. Target objects to the Interrogatories to the extent that they would require Target to disclose information that would cause Target to violate its existing contractual obligations to other parties to maintain the confidentiality of such information.

14. Target objects to the Interrogatories to the extent that they are premature. In responding to such Interrogatories, Target in no way concedes their relevance to the merits and expressly reserves other objections to those Interrogatories.

15. Target has not completed its discovery and preparation in this matter, and Target's investigation of this case is ongoing. Target's responses are being made after reasonable inquiry into the relevant facts, and the responses are based only upon the information and documentation that is presently available to and known to Target. Further investigation and discovery may result in the identification of additional information or contentions, and Target reserves the right to modify its responses. Target's responses should not be construed to prejudice Target's right to conduct further investigation in this case, or to limit Target's use of any additional evidence that may be developed.

16. Documents produced by Target in this litigation shall be deemed produced in response to these Interrogatories, subject to the responses and objections contained herein. The burden of identifying specific information or documents responsive to these Interrogatories from documents produced in the course of this litigation is substantially the same for either party, and Target is entitled to elect the option to produce business records pursuant to Rule 33(d) of the Federal Rules of Civil Procedure.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who provided information to answer these Interrogatories.

RESPONSE TO INTERROGATORY NO. 1:

Target refers to and incorporates its General Objections as though set forth fully herein.

1 Target also objects to this Interrogatory on the ground that it seeks information not calculated to
 2 lead to the discovery of admissible evidence. Target further objects to the extent that the
 3 Interrogatory seeks information protected by the attorney-client privilege or work-product
 4 doctrine.

5 **INTERROGATORY NO. 2:**

6 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 7 that Thomson Consumer participated in a conspiracy with the DEFENDANTS and/or other
 8 CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States
 9 during the RELEVANT PERIOD.

10 **RESPONSE TO INTERROGATORY NO. 2:**

11 Target refers to and incorporates its General Objections as though set forth fully herein.
 12 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome,
 13 particularly since the Interrogatory seeks every piece of evidence despite the fact that Defendants
 14 only first produced documents in response to Plaintiffs' discovery requests on June 25, 2014.
 15 Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories
 16 served by other defendants in this case. Target further objects to the extent that the Interrogatory
 17 seeks information protected by the attorney-client privilege or work-product doctrine. Target also
 18 objects to this Interrogatory to the extent it seeks information equally available to Defendants.

19 Subject to and without waiving any of the foregoing objections, Target states that
 20 information responsive to this Interrogatory is located in the following discovery responses,
 21 documents, and information:

- 22 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
 23 First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- 24 • Second Supplemental Responses and Objections of Panasonic Corporation of North
 25 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
 26 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of
 27 Interrogatories (dated November 2, 2011);

- 1 • Third Supplemental Responses and Objections of Panasonic Corporation of North
2 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
3 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of
4 Interrogatories (dated December 23, 2011);
- 5 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
6 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
7 Interrogatories (dated February 10, 2012);
- 8 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory
9 Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated
10 February 10, 2012);
- 11 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to
12 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5
13 (dated February 10, 2012);
- 14 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
15 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
16 2012);
- 17 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
18 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March
19 21, 2012);
- 20 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
21 Philips Electronics North America Corporation Responses to Direct Purchaser
22 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 23 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
24 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory
25 No. 5 (dated April 12, 2013);
- 26 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
27 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
28 April 26, 2013); and

- Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013).

Target also refers Defendants to documents produced in this litigation at Bates Nos.:

TDA00355; CHU00022689; HDP-CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490; SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511; SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940.

Target also refers the Defendants to the admissions of participation in the CRT antitrust conspiracy included in Thomson SA's 2011 and 2012 Annual Reports to shareholders and the findings of the European Commission regarding the CRT antitrust conspiracy and Thomson

SA's involvement therein, including the fines assessed against Thomson SA. European Commission, "Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels" (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Moreover, Target incorporates by reference the responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by all Defendants in the MDL. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 3:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

RESPONSE TO INTERROGATORY NO. 3:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome, particularly since the Interrogatory seeks every piece of evidence despite the fact that Defendants only first produced documents in response to Plaintiffs' discovery requests on June 25, 2014. Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories served by other defendants in this case. Target further objects to the extent that the Interrogatory seeks information protected by the attorney-client privilege or work-product doctrine. Target also objects to this Interrogatory to the extent it seeks information equally available to Defendants.

Subject to and without waiving any of the foregoing objections, Target states that information responsive to this Interrogatory is located in the following discovery responses, documents, and information:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'

First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);

- 1 • Second Supplemental Responses and Objections of Panasonic Corporation of North
2 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
3 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of
4 Interrogatories (dated November 2, 2011);
- 5 • Third Supplemental Responses and Objections of Panasonic Corporation of North
6 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
7 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of
8 Interrogatories (dated December 23, 2011);
- 9 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
10 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
11 Interrogatories (dated February 10, 2012);
- 12 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory
13 Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated
14 February 10, 2012);
- 15 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to
16 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5
17 (dated February 10, 2012);
- 18 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
19 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
20 2012);
- 21 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
22 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March
23 21, 2012);
- 24 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
25 Philips Electronics North America Corporation Responses to Direct Purchaser
26 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
27
28

- 1 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 2 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory
- 3 No. 5 (dated April 12, 2013);
- 4 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 5 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 6 April 26, 2013); and
- 7 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 8 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013).

9 Target also refers Defendants to documents produced in this litigation at Bates Nos.:

10 TDA00355; CHU00022689; HDP-CRT00055626; HDP-CRT00055593; HDP-
 11 CRT00055190; HEDUS-CRT00126627; HDP-CRT00055091; HDP-CRT00055172; SDCRT-
 12 0002526; CHU00123746; SDCRT-0086490; SDCRT-0086500; SDCRT-0086496; SDCRT-
 13 0086506; SDCRT-0086508; SDCRT-0086511; SDCRT-0086514; SDCRT-0086233;
 14 TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-0087334; SDCRT-0002488;
 15 HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-CRT00168774; SDCRT-0087336;
 16 SDCRT-0087662; HEDUS-CRT00188826; SDCRT-0087340; CHU00121161; SDCRT-
 17 0087667; CHU00031136; SDCRT-0002582; SDCRT-0087664; SDCRT-0087609; HDP-
 18 CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-00004807; HDP-CRT00004413;
 19 SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372;
 20 TDA02994; SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-
 21 0088713; SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375;
 22 SDCRT-0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084;
 23 MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661;
 24 MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077;
 25 SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040;
 26 PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-
 27 0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-062325;
 28 PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-

0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940.

Target also refers the Defendants to the admissions of participation in the CRT antitrust conspiracy included in Thomson SA's 2011 and 2012 Annual Reports to shareholders and the findings of the European Commission regarding the CRT antitrust conspiracy and Thomson SA's involvement therein, including the fines assessed against Thomson SA. European Commission, "Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels" (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Moreover, Target incorporates by reference the responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by all Defendants in the MDL. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 4:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR COMPLAINT after its CRT assets were sold to Videocon in July 2005.

RESPONSE TO INTERROGATORY NO. 4:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome, particularly since the Interrogatory seeks every piece of evidence despite the fact that Defendants only first produced documents in response to Plaintiffs' discovery requests on June 25, 2014. Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories served by other defendants in this case. Target further objects to the extent that the Interrogatory seeks information protected by the attorney-client privilege or work-product doctrine. Target also objects to this Interrogatory to the extent it seeks information equally available to Defendants.

1 Subject to and without waiving any of the foregoing objections, Target states that
 2 information responsive to this Interrogatory is located in the following discovery responses,
 3 documents, and information:

- 4 • Technologies Displays Americas LLC's Responses to Sharp Electronics Corporation
 5 and Sharp Electronics Manufacturing Company of America, Inc.'s First Set of
 6 Interrogatories (dated October 8, 2013);
- 7 • Statement of Albino Bessa Re Technologies Displays Americas, LLC (dated April
 8 18, 2014);
- 9 • Answer of Thomson Consumer Electronics, Inc. to Plaintiff's First Amended
 10 Complaint;
- 11 • Answer of Thomson SA to Plaintiff's First Amended Complaint; and
- 12 • Answer of Technologies Displays Americas, LLC to Plaintiff's First Amended
 13 Complaint.

14 Target also refers Defendants to documents produced in this litigation at Bates Nos.:
 15 TDA00355; MTPD-0410018; MTPD-0410020; PHLP-CRT-062325; PHLP-CRT-062493;
 16 MTPD-0479672.

17 Target also refers the Defendants to the admissions of participation in the CRT antitrust
 18 conspiracy included in Thomson SA's 2011 and 2012 Annual Reports to shareholders. Discovery
 19 is ongoing and Target reserves the right to supplement and/or amend its response to this
 20 Interrogatory as appropriate.

21 **INTERROGATORY NO. 5:**

22 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 23 that Thomson SA continued to participate in the conspiracy that is the subject of YOUR
 24 COMPLAINT after its CRT assets were sold to Videocon in July 2005.

25 **RESPONSE TO INTERROGATORY NO. 5:**

26 Target refers to and incorporates its General Objections as though set forth fully herein.
 27 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome,
 28 particularly since the Interrogatory seeks every piece of evidence despite the fact that Defendants

1 only first produced documents in response to Plaintiffs' discovery requests on June 25, 2014.
 2 Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories
 3 served by other defendants in this case. Target further objects to the extent that the Interrogatory
 4 seeks information protected by the attorney-client privilege or work-product doctrine. Target also
 5 objects to this Interrogatory to the extent it seeks information equally available to Defendants.

6 Subject to and without waiving any of the foregoing objections, Target states that
 7 information responsive to this Interrogatory is located in the following discovery responses,
 8 documents, and information:

- 9 • Technologies Displays Americas LLC's Responses to Sharp Electronics Corporation
 10 and Sharp Electronics Manufacturing Company of America, Inc.'s First Set of
 11 Interrogatories (dated October 8, 2013);
- 12 • Statement of Albino Bessa Re Technologies Displays Americas, LLC (dated April
 13 18, 2014);
- 14 • Answer of Thomson Consumer Electronics, Inc. to Plaintiff's First Amended
 15 Complaint;
- 16 • Answer of Thomson SA to Plaintiff's First Amended Complaint; and
- 17 • Answer of Technologies Displays Americas, LLC to Plaintiff's First Amended
 18 Complaint.

19 Target also refers Defendants to documents produced in this litigation at Bates Nos.:
 20 TDA00355; MTPD-0410018; MTPD-0410020; PHLP-CRT-062325; PHLP-CRT-062493;
 21 MTPD-0479672.

22 Target also refers the Defendants to the admissions of participation in the CRT antitrust
 23 conspiracy included in Thomson SA's 2011 and 2012 Annual Reports to shareholders. Discovery
 24 is ongoing and Target reserves the right to supplement and/or amend its response to this
 25 Interrogatory as appropriate.

26 **INTERROGATORY NO. 6:**

27 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 28 that Thomson Consumer affirmatively concealed its alleged participation in the conspiracy that is

1 the subject of YOUR COMPLAINT.

2 **RESPONSE TO INTERROGATORY NO. 6:**

3 Target refers to and incorporates its General Objections as though set forth fully herein.
 4 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome,
 5 particularly since the Interrogatory seeks every piece of evidence despite the fact that Defendants
 6 only first produced documents in response to Plaintiffs' discovery requests on June 25, 2014.
 7 Target also objects to this Interrogatory on the ground that the term "affirmatively concealed" is
 8 vague and ambiguous. Target also objects to this Interrogatory to the extent that it is duplicative
 9 of other interrogatories served by other defendants in this case. Target further objects to the
 10 extent that the Interrogatory seeks information protected by the attorney-client privilege or work-
 11 product doctrine. Target also objects to this Interrogatory to the extent it seeks information
 12 equally available to Defendants.

13 Subject to and without waiving its objections, Target states that Thomson's actions in
 14 furtherance of the unlawful conspiracy were all done in secret without knowledge of its
 15 customers, consumers, or law enforcement agencies. In addition, public announcements
 16 regarding price changes were misleading and had the effect of concealing Thomson's illegal
 17 conduct. Target further refers to its response to Interrogatory No. 2. Discovery is ongoing and
 18 Target reserves the right to supplement and/or amend its response to this Interrogatory as
 19 appropriate.

20 **INTERROGATORY NO. 7:**

21 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 22 that Thomson SA affirmatively concealed its alleged participation in the conspiracy that is the
 23 subject of YOUR COMPLAINT.

24 **RESPONSE TO INTERROGATORY NO. 7:**

25 Target refers to and incorporates its General Objections as though set forth fully herein.
 26 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome,
 27 particularly since the Interrogatory seeks every piece of evidence despite the fact that Defendants
 28 only first produced documents in response to Plaintiffs' discovery requests on June 25, 2014.

Target also objects to this Interrogatory on the ground that the term “affirmatively concealed” is vague and ambiguous. Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories served by other defendants in this case. Target further objects to the extent that the Interrogatory seeks information protected by the attorney-client privilege or work-product doctrine. Target also objects to this Interrogatory to the extent it seeks information equally available to Defendants.

Subject to and without waiving its objections, Target states that Thomson’s actions in furtherance of the unlawful conspiracy were all done in secret without knowledge of its customers, consumers, or law enforcement agencies. In addition, public announcements regarding price changes were misleading and had the effect of concealing Thomson’s illegal conduct. Target further refers to its response to Interrogatory No. 3. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 8:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegations against the Thomson Defendants contained in paragraphs 142 through 144 of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 8:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome, particularly since the Interrogatory seeks every piece of evidence despite the fact that Defendants only first produced documents in response to Plaintiffs’ discovery requests on June 25, 2014. Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories served by other defendants in this case. Target further objects to the extent that the Interrogatory seeks information protected by the attorney-client privilege or work-product doctrine. Target also objects to this Interrogatory to the extent it seeks information equally available to Defendants.

Subject to and without waiving any of the foregoing objections, Target states that information responsive to this Interrogatory is located in the following discovery responses,

documents, and information:

SDCRT-0002526-2528; SDCRT-0086490-6492; SDCRT-0086503; SDCRT-0086508-6510; SDCRT-0086511; SDCRT-0002488-2489; HEDUS-CRT00168774-8775; SDCRT-0087662-7663; SDCRT-0087340-7342; SDCRT-0087664-7666; SDCRT-0087670-7672; SDCRT-0087705-7707; MTPD-0223790-3792; SDCRT-0006632-6633; TDA02994; SDCRT-0006903-6904; SDCRT-0007239; SDCRT-0007173; MTPD-0576483; SDCRT-0088635-8660; SDCRT-0088661-8674; PHLP-CRT-022741-2744; TDA01365; TDA01360-61.

Target also refers Defendants to its responses to Interrogatory Nos. 2 and 3. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 9:

IDENTIFY each PERSON employed or controlled by YOU who negotiated and/or approved YOUR purchase of CRTs from the Thomson Defendants during the RELEVANT PERIOD.

RESPONSE TO INTERROGATORY NO. 9:

Target refers to and incorporates its General Objections as though set forth fully herein. Target also objects to this Interrogatory on the ground that it seeks information not calculated to lead to the discovery of admissible evidence. Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome. Target further objects to this Interrogatory on the grounds that the terms “controlled by,” “negotiated,” and “approved” are vague and ambiguous. Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories served by other defendants in this case. Target further objects to the extent that the Interrogatory seeks information protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving any of the foregoing objections, Target states that it did not purchase standalone CRTs.

INTERROGATORY NO. 10:

IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the

1 subject of YOUR COMPLAINT.

2 **RESPONSE TO INTERROGATORY NO. 10:**

3 Target refers to and incorporates its General Objections as though set forth fully herein.
 4 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 5 Target further objects to this Interrogatory on the grounds that the terms “controlled by,”
 6 “participated in,” and “investigation” are vague and ambiguous. Target also objects to this
 7 Interrogatory to the extent that it is duplicative of other interrogatories served by other defendants
 8 in this case. Target further objects to the extent that the Interrogatory seeks information protected
 9 by the attorney-client privilege or work-product doctrine.

10 **INTERROGATORY NO. 11:**

11 IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory
 12 No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated
 13 in the conspiracy that is the subject of YOUR COMPLAINT.

14 **RESPONSE TO INTERROGATORY NO. 11:**

15 Target refers to and incorporates its General Objections as though set forth fully herein.
 16 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 17 Target further objects to this Interrogatory on the ground that the terms “reviewed” and
 18 “investigation” are vague and ambiguous. Target also objects to this Interrogatory to the extent
 19 that it is duplicative of other interrogatories served by other defendants in this case. Target
 20 further objects to the extent that the Interrogatory seeks information protected by the attorney-
 21 client privilege or work-product doctrine.

22 **INTERROGATORY NO. 12:**

23 IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject
 24 of YOUR COMPLAINT.

25 **RESPONSE TO INTERROGATORY NO. 12:**

26 Target refers to and incorporates its General Objections as though set forth fully herein.
 27 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 28 Target further objects to this Interrogatory on the ground that the terms “learned of” and

1 “existence” are vague and ambiguous. Target also objects to this Interrogatory to the extent that
 2 it is duplicative of other interrogatories served by other defendants in this case. Target further
 3 objects to the extent that the Interrogatory seeks information protected by the attorney-client
 4 privilege or work-product doctrine.

5 **INTERROGATORY NO. 13:**

6 Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix the
 7 price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
 8 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson
 9 Consumer participated in such a conspiracy regarding CDTs.

10 **RESPONSE TO INTERROGATORY NO. 13:**

11 Target refers to and incorporates its General Objections as though set forth fully herein.
 12 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 13 Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories
 14 served by other defendants in this case. Target further objects to the extent that the Interrogatory
 15 seeks information protected by the attorney-client privilege or work-product doctrine. Target
 16 further objects to this Interrogatory on the ground that it seeks information not reasonably
 17 calculated to lead to the discovery of admissible evidence in that the CRT conspiracy covered
 18 both CDTs and CPTs. Target also objects to this Interrogatory on the ground that it calls for a
 19 legal conclusion. Target further objects to the extent that the Interrogatory seeks information
 20 protected by the attorney-client privilege or work-product doctrine.

21 Subject to and without waiving any of the foregoing objections, Target states that
 22 Defendants’ unlawful CRT conspiracy encompassed both CPT and CDT. Target also refers
 23 Defendants to its responses to Interrogatory Nos. 2 and 3. Discovery is ongoing and Target
 24 reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

25 **INTERROGATORY NO. 14:**

26 Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price
 27 of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
 28 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA

1 participated in such a conspiracy regarding CDTs.

2 **RESPONSE TO INTERROGATORY NO. 14:**

3 Target refers to and incorporates its General Objections as though set forth fully herein.
 4 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 5 Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories
 6 served by other defendants in this case. Target further objects to the extent that the Interrogatory
 7 seeks information protected by the attorney-client privilege or work-product doctrine. Target
 8 further objects to this Interrogatory on the ground that it seeks information not reasonably
 9 calculated to lead to the discovery of admissible evidence in that the CRT conspiracy covered
 10 both CDTs and CPTs. Target also objects to this Interrogatory on the ground that it calls for a
 11 legal conclusion. Target further objects to the extent that the Interrogatory seeks information
 12 protected by the attorney-client privilege or work-product doctrine.

13 Subject to and without waiving any of the foregoing objections, Target states that
 14 Defendants' unlawful CRT conspiracy encompassed both CPT and CDT. Target also refers
 15 Defendants to its responses to Interrogatory Nos. 2 and 3. Discovery is ongoing and Target
 16 reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

17 **INTERROGATORY NO. 15:**

18 IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU
 19 discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT
 20 against the Thomson Defendants.

21 **RESPONSE TO INTERROGATORY NO. 15:**

22 Target refers to and incorporates its General Objections as though set forth fully herein.
 23 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 24 Target further objects to this Interrogatory on the ground that the terms "discovered" and
 25 "caused" are vague and ambiguous. Target also objects to this Interrogatory to the extent that it is
 26 duplicative of other interrogatories served by other defendants in this case. Target also objects to
 27 this Interrogatory on the ground that it is duplicative of Interrogatory Nos. 2-8 and 12. Target
 28 further objects to the extent that the Interrogatory seeks information protected by the attorney-

1 client privilege or work-product doctrine.

2 **INTERROGATORY NO. 16:**

3 Explain why YOU did not name Thomson Consumer as a defendant in your original
4 complaint, *Target Corp et al. v. Chunghwa Picture Tubes, Ltd. et al.*, Case No. 11-cv-05514, filed
5 by YOU on or about November 14, 2011 in the Northern District of California.

6 **RESPONSE TO INTERROGATORY NO. 16:**

7 Target refers to and incorporates its General Objections as though set forth fully herein.
8 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
9 Target also objects to this Interrogatory on the ground that it seeks information not calculated to
10 lead to the discovery of admissible evidence. Target also objects to this Interrogatory to the
11 extent that it is duplicative of other interrogatories served by other defendants in this case. Target
12 further objects to the extent that the Interrogatory seeks information protected by the attorney-
13 client privilege or work-product doctrine.

14
15 DATED: July 10, 2014

By: /s/ Astor H.L. Heaven

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